

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Edward M. Anderson

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

The Town of Kingstree
Richard Turner
Mayor

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

RECEIVED
JSDC CLERK, COLUMBIA, SC
2023 MAR 21 PM 12:10

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

Edward M. Anderson
119 McFarlin St
Kingsville - Wilbarger Co
TX 77625
202-731-0422

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

The Town of Kingsville

Defendant No. 2

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

Richard Treese
Kingsville Town Mgr.
401 N. Longstreet
Kingsville - Wilbarger Co
TX 77625
361-345-7982

Defendant No. 3

Name

Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 Defendant No. 4
 Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*Civil Rights Violation
(Discrimination) / Civil
Rights Act of 1964*

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The plaintiff asks the court to order that the town of Kingstree pay me \$2 million dollars for the physical injuries that I suffered of \$1 million dollars for emotional distress, \$900k for punitive damages which is the cost of the concert.

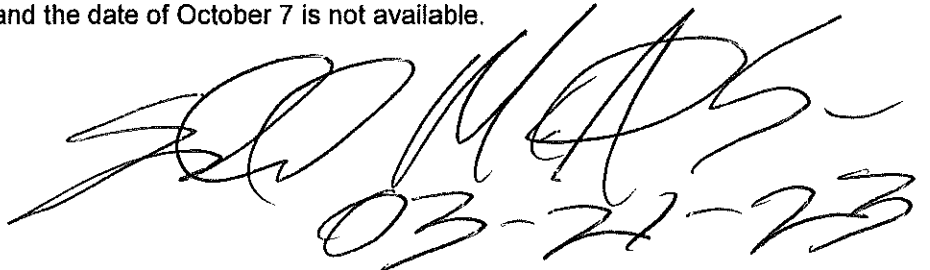
III. STATEMENT OF Chair

From: Edward M. Anderson
115 McFarlin Street
Kingstree, SC 29556
(202) - 731 - 0422

Re: Brief Explanation of Issues I encountered with The Town of Kingstree/Richard Treme (Town Manager): Discrimination, Breach of Contract, and Tortious Interference with a Business Opportunity which occurred for The Boosie Concert on 09-23-22 at The Kingstree Youth Center (Rec Center) located at 375 Nelson Blvd in Kingstree, SC 29556

PARTIES INVOLVED: Dawn Jacobs (White - Female)/Town of Kingstree Administrative Clerk
Richard Treme (White - Male)/Town of Kingstree Town Manager
Darren Tisdale (White - Male)/Kingstree, SC Mayor
Mr. Gibson (Black - Male)/Security Company Owner
Police Chief Kipp Coker (White - Male)/Kingstree, SC Chief of Police
SLED Agent Brandon xxxxx (Black - Male)/Columbia, SC (?)
Tim Duke (White - Male)/Kingstree, SC Chief of the Fire Department
Carla Pack (White - Female)/Ex-Manager at Kingstree, SC Water Department

BRIEF EXPLANATION of Events that occurred for The Boosie Concert held on 09-23-22 at The Kingstree Youth Center (Rec Center) located at 375 Nelson Blvd in Kingstree, SC 29556: Issues started on 01-26-22 - I spoke to Dawn Jacobs (Town of Kingstree Assistant Clerk) and I told her I wanted to do an event outside at The Kingstree Youth Center (Rec Center) at 375 Nelson Blvd in Kingstree, SC 29556. Dawn said she needed to check with the manager who was out sick and the fire department to see if they would approve it first before sending me the application. I said ok, but I still want to submit the application anyway. Dawn did email me the application. On 01-27-22 Dawn sent me an email stating unfortunately we will be unable to accommodate the use of a tent outside the Rec. We can only accommodate the capacity of the building. On 02-10-22 I spoke to Mayor Darren Tisdale about hosting an event and he said talk to Mr. Richard Treme. On 02-24-22 & 02-25-22 I spoke to Dawn to inquire about the response to use the outside grounds for the event and she said I cannot use the outside grounds for an event - I could only use the building at 400 capacity, but she never told me why it was denied. I called Mayor Tisdale after the conversation I had with Dawn and informed him what Dawn said and he said Mr. Treme is out today (02-24-22), but he will be there tomorrow so talk to him. Dawn sent me an email on 02-24-22 saying she checked on Pig Picking and the date of October 7 is not available.


03-21-23

On 02-25-22 I met with Mr. Treme in his office and he asked what I wanted to do? I informed him I spoke to Mayor Tisdale about the event and he said talk to Mr. Treme about it. I informed Mr. Treme I wanted to do an event outside with a band, dj, and an artist at The Kingstree Youth Center (Rec Center) and he asked will there be alcohol and I said yes; he said I cannot have alcohol outside and I said ok and then stated this might not be the place for this event and asked have I tried using The Williamsburg County Rec which I did not respond. Mr. Treme mentioned the Coon Event which was held outside at The Kingstree Youth Center (Rec Center) and stated he informed them that they could not have any alcohol outside and they agreed not to have any alcohol outside so they held their event. Mr. Treme briefly stated that Pig Picking would probably be held downtown Kingstree, SC for 2022.

On 03-04-22 The Town of Kingstree approved the Rental Agreement for the use of the outside grounds for the event which was held on 09-23-22 which stated I would be responsible for paying (1)/one or (2)/two off duty police officers at \$30.00 an hour per officer for the entirety of the event. On 03-21-22 Mr. Treme sent me an email stating building capacity for the event is 440 people and no alcohol is allowed outside of the building.

Prior to 09-06-22 Mr. Treme called me to "verbally" ask me to attend a meeting on 09-06-22 at The Kingstree Police/Fire Department to explain/discuss the Boosie Concert being held at The Kingstree Youth Center (Rec Center). On 08-02-22 Mr. Treme called me and said he is being inundated with calls about the "CROWD" Boosie brings! I said I have security and police will be there. I did a conference call with Mr. Gibson (Security) and Mr. Treme to discuss the event briefly and Mr. Treme said this call made him feel comfortable - this is a small town.

Prior to 09-06-22 Paula Hayes and I met with Kingstree Police Chief Coker to provide him with a copy of the beer/wine license/permit(s) and he asked could I tell him about the event because he didn't have any information on it and doesn't know anything! During our conversation he said they (police) would be there, but he never told me which (1)/one or (2)/two off duty police officers would be at the event pursuant to the rental agreement I signed with The Town of Kingstree. In the past when I hosted events at The Kingstree Youth Center (Rec Center) I would be informed prior to the event who the officers would be working at the event. Prior to the 09-06-22 meeting I asked Mr. Gibson (Security) to attend the 09-06-22 meeting and he said he already had the email for the meeting. I said I don't have an email and I asked whose names were on the email and he said Chief Coker, a few other names, and SLED which I was surprised because I never received an email as the promoter and SLED has never been to any of the previous events I hosted at The Kingstree Youth Center (Rec Center) or attended any events at The Kingstree Youth Center (Rec Center) to my knowledge.

On 09-13-22 Mr. Treme called me (1st call) and said there is a social media post about war (referring to the Boosie Concert). I asked him could he send it to me? Chief Coker sent me the social media post via a text message and I called Mr. Treme and told him the post says don't miss homecoming (had fire emojis), it's street talk to hype up the event, and people are excited about the event!!! Mr. Treme called me (2nd call) again and said he is getting a lot of calls from the the nursing home about loud noise for the Boosie Concert from Ashley (Manager) who said the noise would be a problem. I told Mr. Treme Pig Picking Events had loud noise (fireworks and a fight!) I asked Mr. Treme has he seen the social media posts for Pig Picking Events - then I said let's deal with the elephant in the room --- what's your concern with Boosie? Mr. Treme said Boosie's gonna INCITE the crowd!!! I said Boosie's not going to do that! I called Mayor Tisdale after talking to Mr. Treme and told him what Mr. Treme said and he stated he's receiving calls too and he's trying to help everyone and there's a meeting at 3pm and he would call me back after the meeting. Mr. Treme called me (3rd call) and said his wife saw a social media post with Boosie. I told Mr. Treme I cannot keep up with all social media posts and if anyone violates then Facebook would put them in Facebook jail!!!

On 09-20-22 Mr. Treme, Police Chief Coker, Fire Department Chief Tim Duke, Kingstree City Rec Manager (I believe his name is Mike), and I did a night visit/walk at The Kingstree City Rec. I explained to all that I viewed all the fields of lights and the tennis court lights and I need the (2)/two field lights on, no tennis court lights, and no lights on at the 3rd/last field. Chief Coker kept emphasizing he needed more lights and I informed him that more lights would interfere with the stage lights; he then pointed out to me

SD M. AS
03-21-23

(3)

where the Police would be parked on the grounds at The Kingstree City Rec. Fire Chief Duke told me I had to have a Certified Crowd Management Team at the Boosie Concert to control the crowd - so I asked him which Crowd Management Team did The Town of Kingstree use for Pig Picking Events and he said students!!!

On 09-23-22 (Boosie's Concert) upon arriving at the event I noticed (2)/two police cars at the main entrance of the venue on Nelson Blvd with the blue lights turning so I thought something happened, but they were just sitting in their cars. I noticed 20-30 police cars parked on the opposite side of Nelson Blvd so I knew this was going to scare some people away from attending the event. As I drove around to the back of the venue I noticed the 3rd field of lights on with 5-6 police officers standing on the field which I mentioned during the visit/night walk on 09-20-22 that I would not need those lights on. I asked a SLED Agent could I talk to him for a minute and he told Chief Coker to come with him also. I asked about turning the blue lights off on the police cars at the main entrance (at Nelson Blvd) because people are trying to come to the event and could we make the entrance friendlier by turning off the blue lights? Chief Coker said no because the police are directing traffic - I said no they are not directing traffic because they are not on the street with a flashlight doing that - they are sitting in their cars!!! SLED set up surveillance on top of the building, they had guns, and DRONES flying over people's heads at the Boosie Concert which (2)/(3) people confronted me about!!!

On 09-29-22 I sent Mr. Treme an email asking these questions: Which Crowd Management Company did The Town of Kingstree use at Pig Picking Events 2015 thru 2018? Who requested SLED and other police officers from other jurisdictions to attend the Boosie Concert/reason it was not mentioned/discussed at the 09-06-22 meeting? Why did I not receive an email to attend the 09-06-22 meeting like the other attendees and asked could he provide me a copy of the original email? Mr. Treme never responded.

On 10-01-22 I sent Chief Coker a text message to (843) - 401- 8484 stating Mr. Treme stated he saw on social media there's gonna be war at Boosie's Concert and evidently he had issues sending it , so he had you (Chief Coker) send it. I asked Chief Coker who requested SLED and the other police officers from other jurisdictions to attend the Boosie Concert? I stated it was never mentioned/discussed at the 09-06-22 meeting so this was my reason for asking now. Chief Coker never responded.

On 10-12-22 Mr. Treme called me re: email I sent him on 09-29-22 and said he was uncomfortable discussing the questions I asked!!! I offered to meet with him in his office to discuss the issues and he stated again he' uncomfortable meeting with me!!!

On 03-01-23 I sent Mr. Treme an email re: (2) off duty police officers - who pays for them and I asked what was the reason he said to me a few years ago I cannot keep getting people fired (referring to Carla Pack - ex Kingstree Water Dept Manager)????????!!!!

On 03-24-22 I sent an email to Dawn Jacobs stating she never told me the reason(s) I could not use the outside grounds for the event, the manager's response, and/or the Kingstree Fire Department's response, I asked Dawn am I correct in stating Pig Picking is usually outside on the grounds at The Kingstree City Rec (Youth Center)? I also informed Dawn I spoke to Mayor Tisdale to inform him that she told me I could not use the outside grounds at The Kingstree City Rec (Youth Center) and Mayor Tisdale told me to talk to Mr. Treme about the event.

On 10-07-22 I attended The Pig Picking Event and the Police lights were not turning like they were for the Boosie's Concert. I viewed the fireworks show while standing near the Kingstree Nursing Home which was very colorful, but extremely loud which sounded like bombs were going off!!!

I am suing The Town of Kingstree - Richard Treme (Town Manager) for: (1.) \$90k for Compensatory Damages for Losses, (2.) \$5 Million Dollars for the Egregious Invidious Acts of Discrimination (Intentional and Disparate), (3.) \$5 Million Dollars for Emotional Distress, and (4.) for all court costs and attorney fees. This was Tortious Interference with my business opportunity by The Town of Kingstree - Richard Treme by having more police officers at the event, SLED Agents at the event with surveillance and guns on top


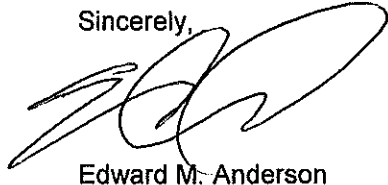
SOD N. APS
03-21-23

(27)

of the building, and flying DRONES over people's head at the Boosie Concert on 09-23-22 caused me to incur a financial loss.

I have also enclosed a copy of the Lawsuit I filed in Kingstree, SC on 03-17-22 citing my allegations against The Town of Kingstree, SC/Richard Treme - Town Manager.

Sincerely,



Edward M. Anderson

03-21-23

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing 07-21, 2022

Signature of Plaintiff

Printed Name of Plaintiff

[Handwritten Signature]
Edward M. Anderson

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

| |
|-------|
| _____ |
| _____ |
| _____ |
| _____ |
| _____ |
| _____ |
| _____ |